

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER
LOWER MANHATTAN DISASTER
SITE LITIGATION

21 MC 102 (AKH)

NAYIBE PADREDIN,

07-CV-05306 (AKH)

Plaintiff,

-against-

**NOTICE OF ADOPTION BY
BLUE MILLENNIUM
REALTY LLC OF ANSWER
TO MASTER COMPLAINT**

80 LAFAYETTE ASSOCIATES LLC, ET AL.,

Defendants.

PLEASE TAKE NOTICE that defendant **BLUE MILLENNIUM REALTY LLC** (hereinafter "Blue Millennium"), as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, herein adopt Blue Millennium's Answer to Master Complaint, dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, Blue Millennium demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York
September 11, 2007

HARRIS BEACH PLLC
Attorneys for Defendant
BLUE MILLENNIUM REALTY LLC

/s/
Stanley Goos, Esq. (SG 7062)
100 Wall Street, 23rd Floor
New York, New York 10005
(212) 687-0100

TO:

Paul Napoli, Esq.
Worby Groner Edelman & Napoli Bern LLP
115 Broadway, 12th Floor
New York, New York 10006

Robert A. Grochow, Esq.
Robert A. Grochow, P.C.
233 Broadway, 5th Floor
New York, New York 10279

Gregory J. Cannata, Esq.
Law Offices of Gregory J. Cannata
233 Broadway, 5th Floor
New York, New York 10279

Liaison Counsel for Plaintiffs

James E. Tyrrell, Esq.
Joseph Hopkins, Esq.
Patton Boggs LLP
One Riverfront Plaza, 6th Floor
Newark, New Jersey 07102

Thomas Egan, Esq.
Flemming Zulack Williamson Zauderer LLP
One Liberty Plaza
New York, New York 10006

Liaison Counsel for the Defendants

All Other Defense Counsel

CERTIFICATION AS TO SERVICE

The undersigned certifies that on September 11, 2007, I caused the following document to be electronically via the Court's ECF system:

1. Notice of Blue Millennium's Adoption of Answer to Master Complaint.

The undersigned further certifies that on September 11, 2007, I caused the aforesaid documents to be served via First Class Mail upon the following:

Paul Napoli, Esq.
Worby Groner Edelman & Napoli Bern LLP
115 Broadway, 12th Floor
New York, New York 10006

Robert A. Grochow, Esq.
Robert A. Grochow, P.C.
233 Broadway, 5th Floor
New York, New York 10279

Gregory J. Cannata, Esq.
Law Offices of Gregory J. Cannata
233 Broadway, 5th Floor
New York, New York 10279

Liaison Counsel for Plaintiffs

James E. Tyrrell, Esq.
Joseph Hopkins, Esq.
Patton Boggs LLP
One Riverfront Plaza, 6th Floor
Newark, New Jersey 07102

Thomas Egan, Esq.
Flemming Zulack Williamson Zauderer LLP
One Liberty Plaza
New York, New York 10006

Liaison Counsel for the Defendants

Dated: September 11, 2007

/s/
Stanley Goos, Esq. (SG 7062)